

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	Criminal No. 2:21-cr-00242-WSH
	)	
vs.	)	Filed Electronically
	)	
ZACKARY WOZNICHAK,	)	
	)	
Defendant.	)	The Honorable W. Scott Hardy

**MOTION TO TRAVEL**

**AND NOW**, comes the Defendant, Zackary Woznichak, by and through his attorney, Lee M. Rothman, Esquire and the law firm of Difenderfer, Rothman, Haber and Mancuso, and files this Motion to Travel as follows:

1. On May 26, 2021, an Indictment was filed, charging Mr. Woznichak in the above-captioned matter.
2. On June 4, 2021, Mr. Woznichak was arraigned and granted an unsecured bond of \$10,000.
3. The above-captioned matter is currently scheduled for a Status Conference on July 18, 2024 before this Honorable Court.
4. Mr. Woznichak has planned a vacation to Tampa, Florida from April 30 – May 6.
5. Mr. Woznichak will be flying out of Pittsburgh International Airport on April 30 at 9:17 a.m. and will arrive at Tampa International Airport at 2:00 p.m.
6. While in Tampa, Mr. Woznichak will be staying with his college friend Jason Goulding.
7. Mr. Woznichak's return flight from Tampa International will be on May 5 at 8:02 p.m., and he will arrive at Pittsburgh International at 12:03 a.m. on May 6.

8. Counsel has spoken with Mr. Woznichak's probation officer, Ms. Jen Kershner, who consents to Mr. Woznichak's planned travel. Ms. Kershner can be reached at (412) 707-3528.
9. Finally, Counsel has conferred with Assistant U.S. Attorney Jonathan Lusty, who defers to the decision of Ms. Kershner, and thus does not object to this travel request.

**WHEREFORE**, the Defendant respectfully requests that this Honorable Court grant the above request and allow him to travel to Tampa Florida from April 30 – May 6, 2024 for his planned vacation.

Respectfully submitted,

s/ Lee M. Rothman

Lee M. Rothman, Esquire

PA I.D. No. 77445

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**Dated: April 22, 2024**

Attorney for Defendant, Zackary Woznichak